

Exhibit C

From: Hamilton, Rayner
Sent: Tuesday, June 27, 2006 5:02 PM
To: 'rhaefe@motleyrice.com'
Subject: FW: Stipulation and Order re Abdullah Bin Khalid Al-Thani

Mr. Haefe:

I see from the attached that you are now joining other plaintiffs' groups in vacating "defaults" and either dismissing defendants by consent or at least addressing their motions to dismiss on the merits. I request the same treatment for my client, Sheikh Yamani.

As my previous letters, other communications, and now my motion make clear, I do not believe you have or can plead a viable cause of action against Sheikh Yamani. The so-called "further particulars" assert nothing other than than generalities or things Judge Casey has already ruled are inadequate. Nor do I think the "default" taken was proper or even defensible. None of this motion practice is a productive use of your time or of mine, to say nothing of the Court's.

In any event, as stated in my email of June 16, 2006 extending your time to respond to my motion, once you reflect on my motion and start to prepare your response, if you conclude that all this might be more properly disposed of by consent rather than burdening the Court, please telephone me. Regards, RMH

From: Scott, Marveta D. [mailto:mscott@motleyrice.com] **On Behalf Of** Haefe, Robert
Sent: Friday, June 23, 2006 4:09 PM
Subject: Stipulation and Order re Abdullah Bin Khalid Al-Thani

Attached, please find the Stipulation and Order sent to Judge Casey on 6/15/06.

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June 15, 2006

VIA FEDERAL EXPRESS

The Honorable Richard C. Casey
United States District Court for the
Southern District of New York
United States Courthouse
500 Pearl Street, Room 1950
New York, New York 10007-1312

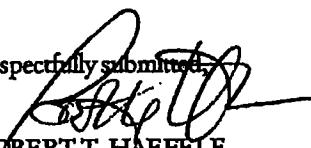
Re: In re Terrorist Attacks on September 11, 2001, MDL No. 1570 (RCQ)
This Document relates to: Barnett et al. v. Al Baraka Inv. & Dev., et al., Case No. 03-CV-9849

Dear Judge Casey:

We have discussed with David E. Nachman, Esq., counsel for defendant Abdullah Bin Khalid Al-Thani, defendant al Thani's request to vacate the default judgment in the above-referenced matter and consent to defendant al Thani's request. This agreement would resolve defendant al Thani's motion to vacate filed and currently pending before Your Honor. Plaintiffs have also consented to this defendant's request to treat defendant's motions to dismiss in the consolidated matters Eurobrokers, Inc., et al. v. al Baraka Inv. & Dev. Corp., et al., Case No. 04-cv-07279 (S.D.N.Y.) and World Trade Center Properties, LLC, et al. v. al Baraka Inv. & Dev. Corp., et al., Case No. 04-07280 (S.D.N.Y.) as having been filed in the above-referenced matter on behalf of this defendant as well, as indicated in the accompanying stipulation.

We have enclosed for Your Honor's signature a stipulation indicating plaintiffs' agreement with Mr. Nachman on behalf of defendant al Thani.

Respectfully submitted,


ROBERT T. HAEFELE

cc: David E. Nachman, Esq. (Via Facsimile)

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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In Re Terrorist Attacks on September 11, 2001

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)
)
03 MDL No. 1570 (RCC)
ECF Case

This document relates to:

BURNETT, *et al.* v. AL BARAKA INV. AND DEV. CORP., *et al.*, Case No. 03-CV-9849.

**STIPULATION AND ORDER VACATING THE DEFAULT
ENTERED AGAINST ABDULLAH BIN KHALID AL-THANI**

Plaintiffs in this action, and Abdullah Bin Khalid Al-Thani ("Sheikh Abdullah"), by and through their undersigned counsel, hereby STIPULATE AND AGREE as follows:

1. The order of default entered against Sheikh Abdullah in this "Burnett" action on April 7, 2006 shall be, and is, vacated.

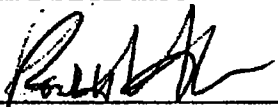
2. Sheikh Abdullah hereby moves to dismiss the Burnett action. The moving papers already served and filed in support of and in opposition to Sheikh Abdullah's motion to dismiss in the Euro Brokers, Inc., et al. v. Al Baraka Inv. & Dev. Corp., et al., Case No. 04-CV-7279 ("Euro Brokers"), New York Marine and Gen. Ins. Co. v. Al Qaida, et al., Case No. 04-CV-6105 ("NY Marine"), and World Trade Ctr. Props., LLC, et al. v. Inv. & Dev. Corp., et al., Case No. 04-CV-7280 ("WTCP") (03-MDL-1570) actions shall be deemed applicable to, and served and filed in, the Burnett action as well.¹

¹ On April 11, 2006, Sheikh Abdullah filed a Motion to Dismiss in the Euro Brokers, NY Marine and WTCP actions (03 MDL 1570, Docket #s 1758-760), and on June 13, 2006, the plaintiffs in those three actions filed an Opposition to that motion (03 MDL 1570, Docket #1837). Sheikh Abdullah's reply in support of his motion to dismiss in those actions is scheduled to be served on or before July 13, 2006, and shall also be served by that date in this action.

3. Sheikh Abdullah's motion to dismiss this action is without prejudice to his position that he has not effectively been named or included as a defendant in this action, which position Sheikh Abdullah may assert in his reply papers in support of his motion to dismiss. To the extent that the assertion of that position raises arguments not raised in Sheikh Abdullah's previously filed moving papers in the Euro Brokers, NY Marine and WTCP cases, the Burnett plaintiffs may file, within seven days of service of the reply memorandum, a sur-reply not to exceed ten pages addressing such new arguments.

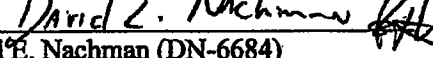
Dated: June 15, 2006

MOTLEY RICE LLC

By 
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Attorneys for Abdullah Bin Khalid Al-Thani

SO ORDERED:

U.S.D.J.

Dated: June __, 2006